

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE
COMPANY, et al.,

Plaintiffs/counter-defendants,

vs.

ABBOTT LABORATORIES,

Defendant/counter-plaintiff.

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) Civil Action No. 03-12501-DPW
) Hon. Judge Douglas P. Woodlock
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**DEFENDANT ABBOTT LABORATORIES' MOTION FOR
IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Defendant and Counter-Plaintiff Abbott Laboratories ("Abbott") hereby moves this Court for leave to file the following documents under seal in connection with Abbott's Brief in Opposition to Plaintiffs' Motion to Compel:

1. Defendant Abbott Laboratories' Brief in Opposition to Plaintiffs' Motion to Compel;
2. Affidavit of Michael D'Orsi in Support of Defendant Abbott Laboratories' Brief in Opposition to Plaintiffs' Motion to Compel; and
3. Declaration of Michelle Campbell in Support of Defendant Abbott Laboratories' Brief in Opposition to Plaintiffs' Motion to Compel.

The materials to be impounded contain confidential information of Abbott and or John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "Hancock") that has been designated "Confidential" or "Highly Confidential" pursuant to the Stipulated Protective Order executed by the parties and entered by the Court in this matter on May 12, 2004 ("Stipulated Protective Order").

Abbott has consulted with John Hancock pursuant to Local Rule 7.1(A)(2), and Hancock concurs that to the extent the above referenced documents contain confidential information that has been designated "Confidential" or "Highly Confidential" by one of the parties, the documents should be filed in compliance with the provisions of the Stipulated Protective Order and Local Rule 7.2.

Abbott respectfully requests that, pursuant to the Stipulated Protective Order, the above-referenced documents that are the subject of this Motion be impounded until further Order of the Court, and returned to outside counsel for Abbott upon the conclusion of such custody.

Respectfully submitted,

ABBOTT LABORATORIES

By: /s/ Michael S. D'Orsi, Esq.
One Of Its Attorneys

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

The undersigned hereby certifies that counsel for Abbott Laboratories has conferred with John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Investors Partner Life Insurance Company (collectively, "Hancock") and that Hancock has no objection to impoundment of the documents that are the subject of this Motion and being filed in connection with Abbott Laboratories' Brief in Opposition to Plaintiff's Motion to Compel.

/s/ Michael S. D'Orsi, Esq.